

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	

**CERTIFICATION OF COMPLIANCE WITH ORDER GRANTING
MOTION TO COMPEL FULL CLAWBACK OF DEBTOR'S
DOCUMENT PRODUCTION AND RELATED RELIEF
ON BEHALF OF ASSURED GUARANTY MUNICIPAL CORP.**

Chadbourne & Parke LLP (“Chadbourne”), as counsel for Assured Guaranty Municipal Corp., formerly known as Financial Security Assurance Inc. (“Assured”), hereby makes the following certification pursuant to the Court’s *Order Granting Motion to Compel Full Clawback of Debtor’s Document Production and Related Relief* dated May 13, 2014 (Docket No. 4710) (the “Clawback Order”) as follows:

1. On May 7, 2014, Chadbourne received a package from Debtor’s counsel Jones Day consisting of media (a hard drive) containing the May 6, 2014 document production (the “Production”) of Debtor, City of Detroit, Michigan (the “Debtor”). Chadbourne did not provide a copy of the Production or any portion thereof in any form to Assured or to any non-Chadbourne personnel.

2. On May 13, 2014, pursuant to the Clawback Order, Chadbourne sent to Jones Day a package that enclosed the original media (hard drive) containing Production which Chadbourne received on May 7, 2014. Chadbourne sent Jones Day this package via overnight Federal Express delivery to the address 51 Louisiana Avenue, N.W., Washington, DC 20001, Attn: Mary Hale, as specified in paragraph 2.a of the Clawback Order.

3. Chadbourne has purged all electronic copies made of the Production or of any portion thereof as required by paragraph 2.b of the Clawback Order.

4. Chadbourne has destroyed any physical copies made of the Production or of any portion thereof as required by paragraph 2.c of the Clawback Order.

5. Chadbourne has destroyed any work product reflecting the contents of any document in the Production, with the exception of any list of Bates numbers from the Production with corresponding subjects and/or issue codes, as set forth in paragraphs 2.c and 3 of the Clawback Order.

Respectfully submitted,

CHADBOURNE & PARKE LLP

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